

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

JESSICA JONES, et al.,

Plaintiffs,

v.

VARSITY BRANDS, LLC, et al.

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

**DECLARATION OF DAVID SEIDEL IN SUPPORT OF INDIRECT PURCHASER
PLAINTIFFS' NOTICE OF NON-OPPOSITION TO UNOPPOSED MOTION FOR
FINAL APPROVAL OF SETTLEMENT**

DECLARATION OF DAVID SEIDEL

I, David Seidel, declare the following under penalty of perjury:

1. I am a Partner of the Joseph Saveri Law Firm, LLP, counsel for Plaintiffs Jessica Jones, Christina Lorenzen, and Amy Coulson (collectively, “Plaintiffs”), in the above-captioned matter. I am a member in good standing of the State Bar of California and have been admitted *pro hac vice* in the United States District Court for the Western District of Tennessee, Western Division. I am over 18 years of age and have personal knowledge of the facts stated in this Declaration. If called as a witness, I could and would testify competently to them. I write this declaration in support of Plaintiffs’ Notice of Non-Opposition, filed concurrently herewith.

2. Attached as **Exhibit A** is a true and correct copy of Angeion Group’s Report Regarding Opt-Outs and Objections, dated November 13, 2024, which states that as of that date the Settlement Administrator had received no opt-out requests and is aware of no objections.

3. In this Court’s order granting preliminary approval of the settlement, ECF No. 612, the Court held that “[n]o later than September 26, 2024,” class members could exclude themselves from the class by mailing a written request to the Settlement Administrator. *See id.* at 29–30.

4. In that order the Court also held that “[n]o later than September 26, 2024,” class members could object to the “proposed Settlement, Settlement Class Counsel’s request for attorneys’ fees, unreimbursed litigation costs and expenses, or service awards for the Class Representatives” by mailing a written request to the Court and to class counsel. *See* ECF No. 612 at 30.

5. The notice plan that was approved by the Court and implemented provided that all objections must be received by September 26, 2024.

6. On October 9, 2024, Settlement Class Counsel notified the Court that as of that date we had received no objections to the proposed settlement or opt-out requests. ECF No. 624.
7. As of November 13, 2024, Settlement Class Counsel has received no objections to the proposed Settlement, and the Settlement Administrator has received no opt-out requests.
8. As of November 13, 2024, Settlement Class Counsel has received no objections to class counsel's request for attorneys' fees or unreimbursed litigation costs.
9. As of November 13, 2024, Class counsel has received no objections to class counsel's request for service awards to the class representatives.
10. Any opposition to the motion for final approval of the settlement would have been due on October 31, 2024. *See* Local Rule 7.01(a)(3). No opposition to Plaintiffs' motion for final approval was filed.
11. I declare under penalty of perjury that the foregoing is true and correct. Executed on November 15, 2024 in San Francisco, CA.

/s/ David Seidel

David Seidel